INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 9/30/16

2. Deadline for first request for production of documents and first request for interrogatories: ~~10/14/16~~ 10/28/16

2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) n/a ; defendant(s) ____

3. Date for completion of any joinder of additional parties and amendment of the pleadings: 12/30/16*

3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) TBD ; defendant(s) ____

4. Number of depositions by plaintiff(s) of: parties 4 ; non-parties 2

5. Number of depositions by defendant(s) of: parties 5 ; non-parties 3

6. Date of status conference (joint status report due two business days in advance): ____

7. Date for completion of factual discovery: 2/28/16

8. Are expert witnesses needed? Yes ____ No x

8(a). Number of expert witnesses, if any, of plaintiff(s): medical ____ ; non-medical ____

8(b). Date for completion of those expert reports: n/a

8(c). Number of expert witnesses, if any, of defendant(s): medical ____ ; non-medical ____

8(d). Date for completion of those expert reports: n/a

9. Date for completion of expert discovery: n/a

10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): ____

11. Types of contemplated dispositive motions by

* Or 30 days following the close of the collective action opt-in period if applicable

plaintiff(s) and dates for filing of those motions: 12/15/16 - motion for conditional certification as a collective

03/28/16 - summary judgment

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: Denying Collective Certification motion to remove individual/name parties and for summary judgment

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes ___ No x

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes ___ No x

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes ___ No x